

Doris Mendiola - Comments on Proposed Generic Letter: Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems

From: "Pelzer, Furnetta (GE Infra, Energy)" <furnetta.pelzer@ge.com>
 To: <mtl@nrc.gov>
 Date: 07/23/2007 3:48:52 PM
 Subject: Comments on Proposed Generic Letter: Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems
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If you have any questions regarding these comments, please contact Randy Bunt, BWROG Chair at (205) 992-7475 or Ken McCall, BWROG Program Manager at (910) 675-6566. Thank you.

Sent on behalf of Randy Bunt, BWROG Chair

Furnetta Pelzer
 Senior Administrative Specialist
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Subject: Comments on Proposed Generic Letter: Managing Gas Intrusion in
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Creation Date: 07/23/2007 3:47:58 PM

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Files	Size	Date & Time
MESSAGE	486	07/23/2007 3:47:58 PM
TEXT.htm	2545	
2007-07-23 ECCS Gas Intrusion BWROG Comment LTR to NRC (BWROG-07039).pdf	89127	
Mime.822	130197	

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Expiration Date:	None
Priority:	Standard
ReplyRequested:	No
Return Notification:	None

Concealed Subject:	No
Security:	Standard

BWR OWNERS' GROUP

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Project No. 691

BWROG-07039

July 23, 2007

Chief, Rules and Directives Branch
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Office of Administration
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

SUBJECT: Comments on Proposed Generic Letter: Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems

Dear Mr. Lesar:

We appreciate the opportunity to provide comments on the proposed generic letter related to Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems.

The BWR Owners' Group has reviewed the proposed generic letter and offers the following comments. The proposed generic letter puts forth a view that, since some licensees have not met requirements, all licensees must now provide a substantial amount of information to demonstrate compliance. This information would then be reviewed by NRC to "determine if additional regulatory action is required." As noted in the proposed generic letter there is ample regulation applicable to gas management. Our overall sense of the operating experience cited in the letter is that this information alone is not sufficient to validate that a generic issue exists. Proper venting in BWR systems is satisfied by plant design features, programs, and analyses including: keep fill systems with alarms, operator rounds, routine venting, periodic flow testing, fill and venting procedures and hydrogen accumulation studies.

Licensees are responsible for assuring compliance with NRC regulations and technical specifications. In our view, any questions regarding the status of licensee compliance with NRC regulations could better be addressed using the existing inspection and oversight processes, including the use of NRC Inspection Manual Temporary Instructions (TIs).

BWROG-07039

July 23, 2007

Page 2

The initial cost for assembly of information is minimal, but the evaluation costs of the information submitted by the licensees will be large. Resolving follow-up questions and developing actions would require extensive manpower resources. An additional burden for the US nuclear utilities will be the NRC cost recovery for the review of the information. Resources, which at this time cannot be quantified, will be required of licensees to defend against potential allegations of non-compliance (implied in the proposed generic letter) or to implement new programs or procedures to meet some new standard of documentation.

Since the proposed generic letter does not demonstrate a generic problem of high safety significance exists, the BWROG suggests that, rather than issuing a proposed generic letter, NRC management address the issue via existing processes at the disposal of the NRC.

If you have any questions regarding these comments, please contact me at (205) 992-7475 or Ken McCall, BWROG Program Manager at (910) 675-6566.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bunt". The signature is stylized with a large, looped "R" and a cursive "Bunt".

Randy Bunt
BWROG Chair

CC:

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